

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal Nos. 05-350 and 05-385
	)	
WANDA SOLOMON	)	

**GOVERNMENT’S REQUEST FOR ADDITIONAL TIME TO RESPOND  
TO DEFENDANT’S (RENEWED) MOTION FOR COMPASSIONATE RELEASE**

AND NOW comes the United States of America, by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and James R. Wilson, Assistant United States Attorney in and for said District, and respectfully requests an additional period of ten (10) days within which to respond to Defendant’s Renewed Motion for Compassionate Release (Doc. 1063) and in support thereof sets forth the following:

1. On or about December 28, 2021, defendant filed with this Honorable Court a Renewed Motion for Compassionate Release (Doc. 1063) predicated largely on an assertion of health related “extraordinary and compelling” circumstances relative to Covid related issues;
2. Subsequent to the filing of this motion this Court issued an order (Doc. 1064) requiring the government to file a response to Defendant’s Renewed Motion by January 18, 2022;
3. Current government counsel was not previously associated with this matter and is newly assigned to respond to Defendant’s (Renewed) Motion;
4. The government has endeavored to prepare a full and sufficient response to the defendant’s motion but has, as of January 17, 2021<sup>12</sup> at 11:07 pm, been unable to secure all the necessary information to allow for a cogent representation to the Court of the defendant’s status relative to BOP records and the government’s position relative to the same. The government has

received a production of records from the institution wherein Ms. Solomon is housed was recently assured that further information (“updated medical records” as required by the Court order at 1064) will be forthcoming in the very near future, a matter of two or three days;

5. The government anticipates having all the necessary information shortly and therefore requests a brief extension of ten (10) days in filing its response to Friday, January 28, 2022.

WHEREFORE THE UNITED STATES respectfully requests that this Honorable Court enter an Order extending the period within which it may respond to the defendant’s Motion to January 28, 2022.

Respectfully submitted,

CINDY K. CHUNG  
United States Attorney

s/James R. Wilson  
JAMES R. WILSON  
Assistant U.S. Attorney  
PA ID No. 27648